

PATRICK D. ROBBINS (CABN 152288)  
Attorney for the United States  
Acting Under Authority Conferred by 28 U.S.C. § 515

MARTHA BOERSCH (CABN 126569)  
Chief, Criminal Division

ROBERT S. LEACH (CABN 196191)  
ADAM A. REEVES (NYBN 2363877)  
KRISTINA N. GREEN (NYBN 5226204)  
ZACHARY G.F. ABRAHAMSON (CABN 310951)  
Assistant United States Attorneys

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-7014  
Fax: (415) 436-7234  
Email: Robert.Leach@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	Case No. CR 18-577 CRB
	)	
Plaintiff,	)	DECLARATION OF ZACHARY G.F.
	)	ABRAHAMSON ATTACHING BUSINESS
v.	)	RECORDS STIPULATIONS
	)	
MICHAEL RICHARD LYNCH and	)	Pretrial Conference: February 21, 2024
STEPHEN KEITH CHAMBERLAIN,	)	Trial Date: March 18, 2024
	)	
Defendant.	)	

I, Zachary G.F. Abrahamson, declare as follows:

- I am a Special Assistant United States Attorney with the United States Attorney's Office for the Northern District of California ("USAO"). I am assigned to the prosecution of the above-referenced case. I attach to this declaration several stipulations entered into by the parties regarding business records produced by various entities and marked as exhibits in the above-captioned case.
- Attached hereto as Exhibit A is a true and correct copy of a business records stipulation

pertaining to certain business records of AT&T.

3. Attached hereto as Exhibit B is a true and correct copy of a business records stipulation pertaining to certain business records of Barclays.

4. Attached hereto as Exhibit C is a true and correct copy of a business records stipulation pertaining to certain business records of Capita.

5. Attached hereto as Exhibit D is a true and correct copy of a business records stipulation pertaining to certain business records of Cardinal Bank.

6. Attached hereto as Exhibit E is a true and correct copy of a business records stipulation pertaining to certain business records of Charles Schwab.

7. Attached hereto as Exhibit F is a true and correct copy of a business records stipulation pertaining to certain business records of HSBC.

8. Attached hereto as Exhibit G is a true and correct copy of a business records stipulation pertaining to certain business records of John Marshall Bank.

9. Attached hereto as Exhibit H is a true and correct copy of a business records stipulation pertaining to certain business records of M&T Bank.

10. Attached hereto as Exhibit I is a true and correct copy of a business records stipulation pertaining to certain business records of Raymond James Financial.

11. Attached hereto as Exhibit J is a true and correct copy of a business records stipulation pertaining to certain business records of RBS.

12. Attached hereto as Exhibit K is a true and correct copy of a business records stipulation pertaining to certain business records of UBS.

13. Attached hereto as Exhibit L is a true and correct copy of a business records stipulation pertaining to certain business records of West Corp.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed this 14th day of March 2024.

/s/ \_\_\_\_\_  
ZACHARY G.F. ABRAHAMSON  
Special Assistant U.S. Attorney